II. FINDINGS

In our interviews, we identified a range of comments, concerns, and issues regarding air quality in Cleveland generally and the proposed pilot project specifically. In summary, we learned the following:

- Stakeholders have a wide range of views on air quality, from the view that Cleveland's air is much improved over decades ago and much better than many Ohio cities, to the view that air quality is very poor and potentially very dangerous to human health.
- Individuals across stakeholder groups and organizations expressed a strong interest in the pilot. Individuals wanted to know more about the technical and financial resources that EPA will bring to the table and motivations and rationales for undertaking this pilot.
- Many interviewees identified the value of increasing education and awareness of air toxics and both within the community and across organizations and businesses.
- Individuals expressed a range of opinions of whether the air toxics pilot could achieve real, measurable reductions in air toxics and risk to air toxics. Some believe significant improvements might be achieved. Others stated that only a few limited actions are likely to be achieved with the time and resources provided. Almost all interviews stated that the pilot would have to extend beyond December 2001 in order to be effective and achieve meaningful results beyond education and increased understanding of air toxics
- Almost all individuals expressed the importance of a long-term regulatory commitment to addressing air toxics, stressing the importance of improving permitting, monitoring, and enforcement of air toxics in addition to convening this pilot and voluntary effort.
- Interviewees also held a range of opinions on the pilot's emphasis on action over monitoring. Some stated that this action-oriented approach would more likely achieve consensus and real results than extensive study and monitoring. Others, however, stated that actions might be cosmetic or simply ineffective unless pilot participants had a reasonable understanding of baseline conditions and conditions after reduction measures are put in place.
- Individuals have a range of views on what would constitute success for this pilot effort. However, most interviewees agreed that increased understanding and awareness, improved relationships among different stakeholders, and at least a few specific, reduction activities are all achievable and realistic goals for this pilot.

Below we described our findings in greater detail.

A. AIR QUALITY IN CLEVELAND AND KNOWLEDGE OF AIR TOXICS

Overall, interviewees rated Cleveland's air quality as neither the worst, nor what it should be. Most noted that air quality in Cleveland has improved over the last several decades. Some viewed this a major success though others noted continued strong concern about particulates, odors, and air toxics.

Elected officials and affiliates
Interviewees who are elected officials or their affiliates considered Cleveland's air quality better than in other cities, if not the best. They noted that city residents may not be aware of air toxics issues in particular, but that citizens are generally concerned about air quality in Cleveland, especially as it relates to large industrial sources.

Environmental organizations
Though some of the interviewees representing environmental groups noted that air quality in Cleveland had improved after the passage of the Clean Air Act, most thought there were still problems with all categories of air pollution, and with nuisance issues such as odors. They mentioned worries about large and small stationary sources of pollutants, for example, LTV Steel, the Ford plant, power plants, and small plating companies, dry cleaners, as well as mobile sources. Interviewees cited concerns about the lack of vigorous enforcement at all levels of government over polluters small and large, including small stationary sources too small to be regulated. Environmental organizations interviewed stated that not enough is known about health effects of many air toxics and that monitoring and knowledge of air toxics in the city is woefully inadequate. Thus, the first order of business of any air quality group should be gathering additional data. These interviewees thought that the key public concerns include rates of asthma incidence, "visible" air pollution during summer months, and odors.

Government agencies
Interviewees from government agencies saw improvement in Cleveland's air quality over the years, as witnessed by the fact that Cleveland has been in attainment. However, some felt the trend might reverse chiefly due to the effects of mobile sources, to the point where Cleveland might fail to reach attainment. Some noted that little is known about air toxics in Cleveland specifically, and that air toxics problems can be very localized, and thus, difficult to monitor (air toxic concentrations may vary significantly block to block).

Government agencies stated that they believe there may be public misconceptions about air quality and risk, such as a focus on odors and smells rather than on odorless air toxics that might pose a greater threat. Some noted that the public also tends to focus on large industrial facilities, when, in fact they may be the most closely regulated and of less concern than mobile sources, small stationary sources, and indoor air quality problems.

Neighborhoods/citizens
With few exceptions, the general feeling of neighborhood representatives and citizens is that Cleveland's air quality is poor, especially in its neighborhoods. The chief indicators, in their view, are odors, visible pollution such as particulates settling on cars and streets, and the incidence of health-related conditions including asthma and other ailments among children and the elderly. Broadly, neighborhood residents are concerned about a range of air quality issues, of which, air toxics is only a subset. Although there is some public awareness of poor indoor air quality and its health hazards, it has not necessarily been the focus of neighborhood concern.

One community representative felt that younger people are less aware of air quality problems and no longer tend to blame large industrial outfits such as LTV steel, citing as an example their willingness to purchase new homes in the vicinity of steel mills. Others cited that older residents

tend to believe the air is much better only because air quality was so poor decades ago. Some stated that there has been an influx of small industry into the neighborhoods, giving residents the feeling that residential areas are being encroached upon, with little control on their part over these sources. For instance, some stated that they had called various businesses and regulatory agencies about concerns and problems, but not received any clear and effective response. Others expressed particular concern with the effects of increased traffic, especially since their neighborhood is very close to a major highway and heavy diesel trucks tend to drive through the residential area.

Resources
Interviewees in the Resources group felt that although air quality had improved in Cleveland over the years, there was room for more improvement. They believe that the public may, at times, worry about sensory signs of pollution (visible plumes, strong odors) and not concern themselves enough with "invisible" pollutants that may pose greater health risks.

Sources
Respondents in the Sources category thought Cleveland's air quality had improved, and was not worse or better than that of comparable cities. One interviewee noted that air quality in the downtown area is substantially worse than outlying suburbs due to the heavy concentration of industry and prevailing winds. Source interviewees noted not only that the public is not aware of air toxics, but that even some industries have a limited understanding of air toxics and their potential health effects. Some stated that the public should be educated on non-point sources of pollution, such as mobile sources and indoor air quality.

Like environmental organizations and neighborhoods, at least some source interviewees expressed frustration with the current regulation of air quality in Cleveland, citing the lack of resources by regulatory agencies, and slow and cumbersome permitting processes that don't provide certainty for business planning. Most sources felt improvements had been made on criteria pollutants. Some noted that established drycleaners in the area have made significant progress reducing levels of PERC and reusing rather than disposing of chemicals.

B. VIEWS OF THE AIR TOXICS PILOT

Our interviewees, across stakeholder groups, expressed strong interest in this project. Most interviewees expressed the willingness to participate either directly at regular meetings, or in some other form, including a technical advisory group, if one is assembled. Many interviewees cited the opportunity that this pilot will create for community-business relations, improvements in air quality, and an increased awareness of air toxics issues. One public agency representative declared the project a great opportunity to look at synergistic problems (indoor, stationary and mobile sources together). Another public agency representative was very supportive because once issues are identified, they believe the pilot can help many types of businesses (bakeries, refineries, print shops) reduce their emissions.

Interviewees expressed a range of comments and concerns about the pilot. These are described below.

1. Representation of Interests on the Working Group

Through our interviewees, we identified six key interests that should be represented on the Working Group. These interests are: neighborhoods, government regulatory/planning agencies, environmental organizations, and indoor, mobile, and stationary sources. After developing this list through initial interviews, most of the later interviewees found the proposed list of stakeholders to be inclusive and balanced. Many gave useful suggestions for adding contacts to better represent certain interests. Some noted the importance of forming a technical advisory committee or enlisting technical experts to aid the group. Some noted that the medical community should be involved in the pilot in some way. Some neighborhood interviewees stated that in order to be effective and take ownership of the process, neighborhoods should comprise a greater proportion than the other interests in terms of numbers.

One source interviewee thought the challenge for this project was to keep people focused. It is difficult to really represent all interests, particularly in the private and public sphere, because representatives at the table may not have the support or be truly representative of those not there (e.g., from other industries or agencies).

2. Emphasis on Reduction Activities over Monitoring and Data Gathering

Interviewees expressed a range of views on the pilot's emphasis on implementing risk reduction activities over further monitoring and data collection. Some stated that this action approach was desirable and would result in real improvements rather than simply improved knowledge. Some praised the intent of "doing" rather than additional study, believing that was important for the pilot's acceptance, sense of success, and replicability elsewhere. Others, particularly neighborhood groups and environmental organizations (and some source interviews) expressed concern that action can not and should not be taken until everyone has a better sense of the actual problems. These interviewees cited the importance of further monitoring to better understand what air toxics are of greatest concern in the neighborhoods before taking action. One neighorhood interviewee stated: "We want to know how bad the air is in our neighborhood." One business interviewee stated strongly the need to assess the baseline before taking action, because without the "before" picture, there can be no proof or certainty of real air toxics reductions. Another source representative suggested that the Working Group would have to balance information gathering and action.

A few interviewees expressed concern with the possibility that the public would be asked to spend a lot of time finding out information when so much is already known. Some felt it would be easier to identify problems than to fix them, and others stated that it would be easier to take concrete actions than to gather credible, reliable, and long-term new data due to expense, limitations of air monitoring, and length of time to build a coherent picture of air quality.

3. Involving Businesses, Industry, and other Sources of Air Toxics

The ability to foster industry involvement was a shared concern for several interviewees. Several suggestions came from representatives of the Sources group. Interviewees identified a range of reasons for why business should be involved in the pilot. They include:

- better understand and address community concerns;

- build working relationships with the community;
- gaining credit for being a good corporate citizen; and,
- leveraging technical and other resources to implement improvements above and beyond what is required by law and regulation.

Some interviewees noted that it might be more difficult to involve medium and small businesses with limited resources and time to participate. Two interviewees from sources expressed concern about the voluntary nature of the project, questioning the incentive for industry to participate. Since any facility may have some compliance issues, by opening themselves in good faith up to scrutiny, this may lead to enforcement and penalties rather than assistance in correcting problems. In addition, some noted, the economy is on a downturn, and companies may not have the resources to participate at this time. Despite these concerns, many sources we spoke with expressed not only interest, but also enthusiasm for participating in the pilot. Some neighborhood interviewees stressed the importance of approaching local companies, if the groups select to do so, even if these companies are not members of the Working Group.

4. The Media

Several interviewees stated the importance of having the media involved in this project in some form. One elected official representative pointed to the need for communication with the public, and advised that general public involvement is critical. Meetings should be open to the general public, and the public should be notified in advance about the meetings. The media should report back on the meetings afterwards. Some suggested hiring a PR person to send out press releases and tend to other outreach activities. A resource representative proposed that the interface with the media required connections with the major TV stations, the major local newspapers, and maybe radio stations. The various media should be left to decide how to disseminate the project information. Some noted that the more the media understands about the project, the better job they will do communicating this to the wider public. Some also suggested that the group appoint a committee spokesperson or media liaison who can help disseminate a credible and consistent message to the public.

5. The Voluntary Pilot and Required Regulatory Compliance

Some interviewees, particularly those from the neighorhoods and environmental organizations expressed concern that regulatory agencies and /or industry might see or use this project as a way to "opt out" or avoid regulatory requirements, compliance, and, if necessary, enforcement. Many interviewees wanted to be credibly assured that this pilot would be *in addition* to on-going regulatory compliance and enforcement efforts, and not a replacement for those activities. An elected official representative advised that this project should not in any way be construed as implying a reduction in compliance efforts. Another wanted to ensure that USEPA did not turn to voluntary measures at the expense of handling important issues through enforcement.

Some interviewees raised additional concerns such as:

- the concern that this might be a public relations effort on EPA's part rather than a sincere effort to improve air quality (some participants stated that they don't want to be a "rubber

stamp" for a project that they do not fully understand and do want real power to influence the project);
- the perception that polluters are at the table to prevent any strategies that might impose actual controls and costs on them;
- the belief that the EPA has not done everything it could where it has the authority and instead, offers the community possible voluntary rather than assured required measures; and,
- the concern that the structure of these processes usually entails extensive meetings which are good for people employed in industry but bad for neighborhoods, wearing down people with few resources.

6. The Pilot and the New Presidential Administration

Many neighborhood, environmental organizations, and local interviewees expressed concern and skepticism about the pilot and its relationship to the new Bush presidential administration.

Some interviewees stated that the visit of Administrator Whitman to Cleveland announcing the project was without proper notice, local involvement, and raised the concern that the pilot was part of a new EPA approach emphasizing voluntary action rather than compliance to existing regulations. Some interviewees are very concerned that the pilot does not represent a commitment to environmental protection and enhancement by the new administration and will be used as a public relations effort rather than a meaningful way to improve air quality in Cleveland. Others expressed concern that, due to the new administration's approach, the pilot will focus on individual citizen action resulting in small gains rather than on business/industry action resulting in large gains in air quality.

7. Information needs

Interviewees cited a number of possible information needs for the working group. This includes the following:

- What are all of the various sources and source types in the neighborhoods and what are the limits of information.
- A review of the regulatory framework – what's required by law, what is enforced, what is voluntary.
- A review of best practices from other places.
- Education about health concerns/risk and translating sources to exposure to health impacts.
- A map of the area with all the companies that are there, and what types of chemicals and toxics those companies use and produce.
- Information about small businesses and companies that are not reporting; generic descriptions on the types of toxics produced by typical businesses (e.g. a typical drycleaner produces).
- The health effects of chemicals used in the area, for example, an inventory of health problems that could be associated with those chemicals.

- Incidence of health impacts in their community (e.g., asthma, cancer, birth defects, etc.), including soliciting data from hospitals utilization review departments.
- The monitoring capabilities pertaining to air pollution that exist in the area, including where they are, what they do or do not monitor for, and how often.
- Impacts of public transportation in the area on air quality, including the airport.
- Available historical information about health impacts.
- New businesses planning to come into the neighborhood, and old businesses planning to expand their operations in the neighborhood.
- Cumulative exposure of residents to various toxics.
- The community's emergency action plan (e.g., concerning fugitive emissions or explosions).

In general, many interviewees requested that data presented should be easy to understand and that engineers and other specialists speak in lay-person's terms and not "techno-speak." The interviewees suggested that, whenever possible, information should have graphs, maps, and visuals, which can be referenced quickly and easily.

8. Proposed Project Timeline

In most of our interviews, particularly the first several we conducted, we relayed the goal of completing most of the pilot by December 2001 (i.e., identifying options for action, prioritizing those actions, and implementing the actions). Many interviewees -- especially those with participatory process experience -- found the timeline unrealistic, especially if the goal of the pilot was a measurable change in risk from air toxics. Some felt that with the proposed year-or-less timetable, their participation would not even be worth while. A few interviewees found the proposed December timeline acceptable, while a few others liked the tight timeline while acknowledging the difficulties of achieving it because they thought the pressure would yield results. Many mentioned the importance of EPA's continued commitment to the project beyond the December 2001 deadline. Though some raised concern about the December timeline for final completion, they mentioned the importance of achieving at least small successes by December to maintain interest and motivation in the project.

Additional, specific concerns about the proposed timeline are included below.

- The involvement of large institutions and businesses with planning and budgeting horizons (like RTA and large industries) takes time.
- Since measurable results by December are unrealistic, reasonable goals for December are a recognition of problems and commitment to take action.
- The project appears to be just a PR exercise because of the artificial deadline.
- The necessity of declaring a false success because not much has been accomplished for sheer lack of time.
- Developing and preparing educational materials and then engaging in outreach takes time.
- The community groups are overburdened with issues, participation is difficult to secure and it's hard to find staff time for everything.

- The diversity of the city and of the working group coupled with the complexity of the challenge will make it slow going.
- At best, the proposed time frame allows only for information dissemination;
- Artificial deadline may force action without enough education and deliberation, exacerbating conflict and differences rather than allowing time to work through the issues.

9. Resources Available to the Group

Several interviewees, especially neighborhood and environmental representatives, expressed concern with various funding aspects of the project and requested clarity on the availability and amount of funding, to enable them to plan and staff this and other projects in which they plan to be involved. Some recommended that EPA provide a basic structure and specify parameters and rules from the outset, to increase participation. Many interviewees want to know what kinds of technical resources EPA can bring to the table and how much money the group may have access to in order to implement one or more activities.

C. WHAT IS SUCCESS?

We asked the interviewees what they would consider "success" once the pilot was completed. We have compiled the responses below by stakeholder groups.

Elected officials and affiliates
Elected official representatives offered measures spanning outcomes and relationships. Besides risk reduction, they wished to see increased public awareness of toxics and public willingness to help out. For the two Cleveland neighborhoods directly involved in the project, respondents sought satisfaction among participants as well as a kind of structure or organization in place that would enable committed individuals to work on an ongoing basis past the pilot's completion.

Environmental groups
Environmental group representatives noted that the pilot ought to define short and longer-term measures of success. In the short-term, interviewees identified increased awareness and understanding, working relationships, and perhaps a few, small concrete actions, as important outcomes. Over the longer-term, some interviewees stated that the Working Group ought to develop an overall air toxics strategy that ranges from compliance to enforcement to voluntary actions to technical assistance. Others expressed a preference for a more narrow focus, such as, the neighborhood focuses on one particular air toxic of concern and systematically sets out to significantly reduce its presence in the neighborhood.

Several interviewees mentioned information and education outcomes, including:

- Accurate appraisal of the biggest toxic risks a neighborhood resident faces.
- Education, including children, so that the community can understand the issues and make good choices in terms of what to focus on that can achieve meaningful, environmental results.

- Improved understanding of the regulatory framework so people are better skilled at making the system work to meet their interests.

Some felt that the pilot should generate concrete results, including:

- Enforceable measures agreed to by actors and followed through, with mechanisms to monitor the follow through.
- Initial moderate successes and a long-term effort in place that can sustain work over time.
- Clear picture of commitments and expectations, and evaluation plans for each action project selected.

Government agencies:
Government agency representatives focused on the public's satisfaction with the process, the importance of education and increased understanding, and the new relationships that could be built among the public, agencies, and industries. The following were viewed as indicators of success:

- If the Working Group can reach consensus.
- If the community and the government agencies can look at each other differently.
- If agencies gain awareness about the public's needs and concerns.
- If we strengthen the credibility and authority of environmental regulation.

Like other stakeholder groups, many agency interviewees felt that the pilot should generate concrete results, including:

- Achieve some small quantifiable successes. Though, it is unclear that monitoring will actually be able to measure this success.
- Known improvements such as companies not idling vehicles or making a commitment to change the production process or invest in equipment to improve air quality -- not measurable in terms of monitoring, but measurable in terms of concrete actions people can see

Neighborhoods/citizens
Neighborhood representatives wanted to look back on an engaging, meaningful, and substantial community participation process. The measures of success for neighborhood interviewees included some of the same criteria, but added additional, community-specific criteria. Points cited include the following:

- People energized about air quality in their neighborhoods.
- People who learned something about air toxics.
- People beginning to understand the language of air toxics and action at the grass roots level.
- "Anything that sends us forward instead of at a standstill."
- Achievable common-sense goals and strategies; for example, if the goal is community education, then give clear instructions on how to educate, and provide resources (training, site visits).

- A commitment of the group to work together on an ongoing and continuous basis (the project will be seen as a failure if it ends completely in December).
- A good neighbor policy with one or more large sources.
- A cooperative relationship with the companies in the neighborhood.
- Better air quality than today.
- A reduction in the number of adverse health outcomes, for instance, reductions in cases of asthma.

Resources
Resources representatives were perhaps the most ambitious in their expectations, as well as the most specific. Examples include the following:

- Local polluters agreed to a mix of mandated and voluntary emission reductions.
- At least two concrete initiatives that are well defined and well detailed, that will have a good chance of reducing air toxics in the neighborhood in the short/medium/long term.
- Proposed measures that are accompanied by credible plans with a timetable.
- Intensive monitoring of health effects and of air quality at the neighborhood level.
- The actual process has a starting point and an end point and you can quantify the improvement in-between. For example, an initiative to reduce PERC from dry-cleaners or gasoline station emissions from underground storage tank vents.
- A credible understanding of risks by the community.

Sources
Sources interviewees expressed both general and specific measures of success. They included the following:

- Awareness as success; the pilot should be a worthwhile learning experience.
- Effective information dissemination to small businesses so that they understand the effects of the chemicals they use.
- Getting away from preconceived notions of what is noxious to what poses substantial risks.
- If the group does baseline sampling with initial results (indoor and outdoor) and formulates objectives, this would be progress.
- A list of action items with buy-in of all groups; a clear sense of direction agreed to by all.
- Identification of specific strategies for implementation, and opportunities for voluntary measures to reduce toxics.
- Two (not quick fixes but something not too expensive) projects that would be implemented in our schools – an alternative cleaning program for instance.
- Identification of types of controls to improve public health.
- Change in behavior of citizens and companies.
- Reductions in emissions from public transportation, trucks, and cars.
- Reduction in toxic air pollution in the area.
- At the end, people are still on board, still support, there are no pockets of critics attacking the effort.
- The community is truly and meaningfully involved.

- Clearly replicable, clear model that can be implemented elsewhere.